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July 9, 2012

VIA FACSIMILE (718.613.2365)

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room 1230
Brooklyn, New York 11201

Re: Ligia Ramos-Restrepo; Case No. 12-MJ-00600 (CLP)

Dear Judge Pollak:

We were recently retained to represent Ligia Ramos-Restrepo in the above-referenced matter.¹ Approximately two weeks ago, Ms. Ramos-Restrepo was arrested pursuant to a criminal complaint after travelling to New York from Cali, Colombia to visit her children. Ms. Ramos-Restrepo posted bail and was released under the supervision of her son, Carlos Hernandez, and confined to his apartment located at 150 4th Avenue, Brooklyn, New York. Ms. Ramos-Restrepo was ordered to wear a monitoring device, and is not permitted to leave the apartment.

We respectfully request that the Court modify Ms. Ramos-Restrepo's bail conditions to permit her to visit the fitness facility and the roof deck located within the apartment building to which she is confined. Ms. Restrepo-Ramos is not required to exit the apartment building to access either the fitness center or the roof deck.

We respectfully request the foregoing modifications in consideration of Ms. Ramos-Restrepo's health. Ms. Ramos-Restrepo was diagnosed with various conditions several years ago by her attending physician in Colombia, including gastrointestinal dysfunction, thyroid dysfunction, low blood pressure and osteoporosis. In connection with these conditions, she was prescribed and routinely takes the following medications: Nexium, Zanax, Eutirox, and Ibandronate. She was also prescribed a series of exercises and advised to routinely walk, specifically in connection with her thyroid dysfunction and osteoporosis. Ms. Ramos-Restrepo cannot perform these exercises within her son's apartment.

¹ Counsel will file a notice of appearance with the Court tomorrow.

Mr. Louis Calvi
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Accordingly, we respectfully request that the Court permit Ms. Ramos-Restrepo to visit the fitness facility and roof deck located within the apartment building. Neither the Assistant United States Attorney, Brandon King, nor the Pre-trial Services Officer, Louis Calvi, objects to our request.

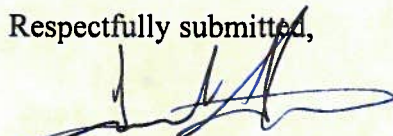
Relatedly, we anticipate that Ms. Ramos-Restrepo will need to visit one or more physicians within the next month to obtain prescriptions from a local doctor for the above-listed medications, which she takes as a matter of course.

We will locate and submit to Pre-trial Services the name(s) of the physician(s) who will treat Ms. Ramos-Restrepo; however, we wish to alert the Court in the interim that certain medical appointments will be necessary for the continued treatment of the above-listed conditions and to request permission for Ms. Ramos-Restrepo to travel to such appointments.

Should the Court grant the above-requested bail modifications, we have provided a "So Ordered" designation for your signature below.

We remain available at the convenience of the Court.

Respectfully submitted,



Savannah Stevenson

cc: Brandon King, Assistant United States Attorney (via facsimile, 718.254.6479)
Louis Calvi, United States Pre-trial Services Officer (via facsimile, 718.613.2568)

SO ORDERED:

Cheryl L. Pollak, United States Magistrate Judge